

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RICHARD STECK, Individually and on Behalf :  
of All Others Similarly Situated, :

Plaintiff, :

v. :

SANTANDER CONSUMER USA HOLDINGS :  
INC., THOMAS G. DUNDON, JASON :  
KULAS, JUAN CARLOS ALVAREZ, :  
ROMAN BLANCO, GONZALO DE LAS :  
HERAS, STEPHEN A. FERRISS, MATTHEW :  
KABAKER, TAGAR OLSON, ALBERTO :  
SÁNCHEZ, JAVIER SAN FELIX, JUAN :  
ANDRES YANES, DANIEL ZILBERMAN, :  
CITIGROUP GLOBAL MARKETS INC., J.P. :  
MORGAN SECURITIES LLC, MERRILL :  
LYNCH, PIERCE, FENNER & SMITH :  
INCORPORATED, DEUTSCHE BANK :  
SECURITIES INC., SANTANDER :  
INVESTMENT SECURITIES INC., :  
BARCLAYS CAPITAL INC., GOLDMAN, :  
SACHS & CO., MORGAN STANLEY & CO. :  
LLC, RBC CAPITAL MARKETS, LLC, BMO :  
CAPITAL MARKETS CORP., CREDIT :  
SUISSE SECURITIES (USA) LLC, UBS :  
SECURITIES LLC, WELLS FARGO :  
SECURITIES, LLC, KKR CAPITAL :  
MARKETS LLC, SANDLER O'NEILL & :  
PARTNERS, L.P., STEPHENS INC. and :  
LOYAL3 SECURITIES, INC., :

Defendants. :

14-cv-6942 (JPO)

**RULE 7.1 DISCLOSURE  
STATEMENT**

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for  
defendants Citigroup Global Markets Inc., J.P. Morgan Securities LLC, Merrill Lynch, Pierce,  
Fenner & Smith Incorporated, Deutsche Bank Securities Inc., Santander Investment Securities  
Inc., Barclays Capital Inc., Goldman, Sachs & Co., Morgan Stanley & Co. LLC, RBC Capital  
Markets, LLC, BMO Capital Markets Corp., Credit Suisse Securities (USA) LLC, UBS

Securities LLC, Wells Fargo Securities, LLC, KKR Capital Markets LLC, Sandler O'Neill & Partners, L.P., Stephens Inc. and LOYAL3 Securities, Inc. (collectively, the "Underwriter Defendants") state as follows:

1. Citigroup Global Markets Inc.

Citigroup Global Markets Inc. is a wholly-owned subsidiary of Citigroup Financial Products Inc., which, in turn, is a wholly-owned subsidiary of Citigroup Global Markets Holdings Inc., which, in turn, is a wholly-owned subsidiary of Citigroup Inc., a publicly held company. Citigroup Inc. has no parent corporation and no publicly held corporation owns 10% or more of its stock.

2. J.P. Morgan Securities LLC

J.P. Morgan Securities LLC is a wholly-owned subsidiary of JPMorgan Broker-Dealer Holdings Inc., which, in turn, is a wholly-owned subsidiary of JPMorgan Chase & Co., a publicly held company. JPMorgan Chase & Co. has no parent corporation and no publicly held corporation owns 10% or more of its stock.

3. Merrill Lynch, Pierce, Fenner & Smith Incorporated

Merrill Lynch, Pierce, Fenner & Smith Incorporated is a wholly-owned subsidiary of NB Holdings Corporation. NB Holdings Corporation is a direct subsidiary of Bank of America Corporation, which owns all of the common stock of NB Holdings Corporation. Bank of America Corporation is a publicly held company whose shares are traded on the New York Stock Exchange. Bank of America Corporation has no parent company and no publicly held corporation owns more than 10% of Bank of America Corporation's shares.

4. Deutsche Bank Securities Inc.

Deutsche Bank Securities Inc. is a wholly-owned indirect subsidiary of Deutsche Bank AG. Deutsche Bank AG has no parent corporation and no publicly held corporation owns 10% or more of its stock.

5. Santander Investment Securities Inc.

Santander Investment Securities Inc. is an indirect, wholly owned subsidiary of Banco Santander, S.A., which is a publicly traded company. Banco Santander, S.A. has no parent corporation and no publicly held corporation owns 10% or more of its stock.

6. Barclays Capital Inc.

Barclays Capital Inc. identifies the following as parent corporations or publicly held corporations that own 10% or more of any class of its equity interests: Barclays PLC, Barclays Bank PLC and Barclays Group US Inc.

7. Goldman, Sachs & Co.

Goldman, Sachs & Co. is an indirectly wholly-owned subsidiary of The Goldman Sachs Group, Inc., which is a corporation organized under the laws of Delaware and whose shares are publicly traded on the New York Stock Exchange. No other publicly held company owns more than a 10% interest in Goldman, Sachs & Co.

8. Morgan Stanley & Co. LLC

Morgan Stanley & Co. LLC is a limited liability company whose sole member is Morgan Stanley Domestic Holdings, Inc., a corporation wholly owned by Morgan Stanley Capital Management, LLC, a limited liability company whose sole member is Morgan Stanley. Morgan Stanley is a publicly held corporation that has no parent corporation.

Based on Securities and Exchange Commission Rules regarding beneficial ownership, Mitsubishi UFJ Financial Group, Inc., 7-1 Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-8330, beneficially owns greater than 10% of Morgan Stanley's outstanding common stock.

9. RBC Capital Markets, LLC

RBC Capital Markets, LLC is an indirect wholly owned subsidiary of the Royal Bank of Canada, a publicly held company whose shares are traded on the New York Stock Exchange and Toronto Stock Exchange. The Royal Bank of Canada has no parent company and no publicly held corporation owns 10% or more of its stock.

10. BMO Capital Markets Corp.

BMO Capital Markets Corp. is an indirect wholly-owned subsidiary of Bank of Montreal, a publicly held company. Bank of Montreal has no parent company and no publicly held corporation owns 10% or more of its stock.

11. Credit Suisse Securities (USA) LLC

Credit Suisse Securities (USA) LLC is a wholly-owned subsidiary of Credit Suisse (USA), Inc., which, in turn, is wholly owned by Credit Suisse Holdings (USA), Inc., which, in turn, is jointly owned by: (i) Credit Suisse Group AG, Guernsey Branch, which is a branch of Credit Suisse Group AG, and (ii) Credit Suisse AG, a wholly-owned subsidiary of Credit Suisse Group AG. No publicly held corporation owns 10% or more of Credit Suisse Group AG's stock.

12. UBS Securities LLC

UBS Securities LLC is jointly owned by UBS AG and UBS Americas Inc. UBS Americas Inc. is wholly-owned by UBS AG, a publicly held company. UBS AG has no parent corporation and no publicly held corporation owns 10% or more of its stock.

13. Wells Fargo Securities, LLC

Wells Fargo Securities, LLC is wholly owned by EVEREN Capital Corporation, which is wholly owned by Wells Fargo & Company, a publicly held company whose shares are traded on the New York Stock Exchange. Wells Fargo & Company has no parent corporation and no publicly held corporation owns 10% or more of its stock.

14. KKR Capital Markets LLC

KKR Capital Markets LLC is an indirect subsidiary of KKR & Co. L.P., a publicly held company whose common units are traded on the New York Stock Exchange. The general partner of KKR & Co. L.P. is KKR Management LLC, and based on publicly filings made with the Securities and Exchange Commission, no publicly held corporation owns 10% or more of the publicly traded common units of KKR & Co. L.P. or of the limited liability company interests of KKR Management LLC.

15. Sandler O'Neill & Partners, L.P.

Sandler O'Neill & Partners Corp. is the sole general partner of Sandler O'Neill & Partners, L.P. Sandler O'Neill & Partners Corp. is controlled by SOP Holdings, LLC. SOP Holdings, LLC has no parent corporation and no publicly held corporation owns 10% or more of its stock.

16. Stephens Inc.

Stephens Inc. is a wholly owned subsidiary of SI Holdings Inc. 100% of the voting stock of SI Holdings Inc. is held by Stephens Financial Services LLC. Stephens Financial Services LLC has no parent corporation and no publicly held corporation owns 10% or more of its stock.

17. LOYAL3 Securities, Inc.

LOYAL3 Securities Inc. is a wholly owned subsidiary of LOYAL3 Holdings, Inc.

LOYAL3 Holdings, Inc. has no parent corporation and no publicly held corporation owns 10% or more of its stock.

October 15, 2014

/s/ Jay B. Kasner  
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